## UNITED STATE BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

In re

Wellington & Pulaski Condominium Association Inc.,

Debtor.

CHI4005 LLC, an Illinois limited liability company, 4003 Wellington 2, Inc, an Illinois Corporation, Plaintiff,

VS.

Wellington & Pulaski Condominium Association Inc, an Illinois not-for-profit corporation. Wellington Pulaski **Irrevocable** Trust, The Board Managers of the Wellington & Pulaski Condominium, 7942 Country Club Inc, an Illinois Not for Profit corp., 7942 Country Club Irrevocable Trust, James Reed, James W Reed, James W Reed Jr., George Somer, Leonardo Coppola and Antonio Tapia, Defendants,

And

J P Morgan Chase Bank, A necessary party solely to enforce the order of court. Chapter 11 Case No. 15 B-035476 Judge Carol A. Doyle

Hearing Date: 12/02/2015 Hearing Time: 10:30 a.m.

Adversary Proc. No. 15-00786

Removed from the Circuit Court of Cook County, Illinois, Case No. 15 CH 14052

## EXHIBIT III, PART 1, TO MOVANTS' MOTION TO DISMISS IN CHAPTER 11 CASE NO. 15 B-035476 AND TO

**MOVANTS' MOTION TO REMAND IN ADVERSARY PROCEEDING NO. 15-00786** 

Kenneth A. Henry, Esq. (ARDC No. 1193457) Attorney for Movants One North LaSalle Street, Suite 2200 Chicago, Illinois 60602 (312) 857-0100 khenry@kahlaw.com

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that he is causing a copy of these Exhibits to be served upon the following counsel of record by CM-ECF service, this 25<sup>th</sup> day of November 2015:

Patrick S Layng USTPRegion11.ES.ECF@usdoj.gov

Esther E Tryban Telser on behalf of Creditor City of Chicago, a municipal corporation <a href="mailto:etrybantelser@cityofchicago.org">etrybantelser@cityofchicago.org</a>

And by U.S. Mail on the 20<sup>th</sup> day of November 2015 to the following:

GEORGE OPARANOZIE, ESQ. Options Law Group, P.C. 123 W. Madison Street, Suite 1400 Chicago, IL 60602 Attorney for Petitioning Creditors

PROVEST DE II Inc. c/o Jeffrey Nelson [registered agent] 310 Busse Rd Park Ridge, III 60068

PROVEST REALTY SERVICES INC c/o Pro Vest De II Inc [registered agent] 161 N Clark Street #4700 Chicago, Illinois 60601

GEORGE SOMER 310 Busse Rd Park Ridge, IL 60068

JAMES REED c/o Chatt & Prince, P.C. Robert Prince, Attorney at Law 16W347 83<sup>rd</sup> Street, Suite C Burr Ridge, IL 60527

WELLINGTON & PULASKI CONDOMINIUM ASSOC. INC c/o Pro Vest De II Inc [registered agent] 161 N Clark Street #4700 Chicago, Illinois 60601

7972 COUNTRY CLUB IRREVOCABLE TRUST 7942 W Country Club Lane Elmwood Park, IL 60707

7942 COUNTRY CLUB INC c/o Sonoma Eqx Inc [registered agent] 150 S Wacker Dr 24th Floor Chicago, IL 60602

BOARD OF MANAGERS WELLINGTON & PULASKI CONDOMINIUM 2960 N Pulaski Rd Chicago, IL.

WELLINGTON PULASKI IRREVOCABLE TRUST 150 N Michigan Ave #2800 Chicago, IL 60601

> /s/Kenneth A. Henry Kenneth A. Henry, Esq.

KENNETH A. HENRY, ESQ. (ARDC # 1193457) One North LaSalle Street, Suite 2200 Chicago, Illinois 60602-3912 312.857.0100/312.857.1157 (fax) khenry@kahlaw.com